

AT&T, Inc. 1401 I Street NW, Suite 400 Washington, D.C. 20005 Phone 202 326-8895 Fax 202 408-8745

December 6, 2005

## **VIA ELECTRONIC SUBMISSION**

Marlene H. Dortch Secretary Federal Communications Commission 445 12<sup>th</sup> Street SW Washington DC 20554

Re: In the Matter of Commercial Availability of Navigation Devices CS Docket No. 97-80

Dear Ms. Dortch:

On Monday, December 5, 2005, Christopher Boyer, Jim Lamoureux, Cecilia Martaus, Brent Olson, and Jim K. Smith, on behalf of AT&T, Inc (AT&T)., met with Donna Gregg and members of her staff to discuss various topics concerning AT&T's Project Lightspeed network deployment and its provision of IP-based video service ("IPTV"). Consistent with the attached presentation, AT&T described the network architecture of Project Lightspeed, including in-home architecture and devices. AT&T also discussed the application of 47 U.S.C. § 549 and the Commission's "navigation devices" rules to Project Lightspeed and IPTV. AT&T reiterated that it will be MVPD, and thus will be subject to the provisions of 47 U.S.C. § 549 and 47 C.F.R. § 76.1200, *et. seq.* AT&T also indicated that because it will not be providing a "digital cable system," Project Lightspeed and IPTV will not be subject to the Commission's unidirectional "plug and play" rules, and AT&T anticipates that any bidirectional plug and play rules similarly will not apply.

If you have any questions, please do not hesitate to contact me at (202) 326-8895.

Sincerely,

/s/ Jim Lamoureux Senior Counsel AT&T, Inc.

Attachment

Cc: Donna Gregg William Johnson Andrew Long Mike Lance Ms. Dortch December 6, 2005 Page 2 of 2

> Alison Greenwald John Norton Deborah Klein Mary Beth Murphy Natalie Roisman John Kiefer